

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: **Bryan T Maloney and** : No. 16-10738 - mdc  
**Cindy G. Maloney, debtors** : Chapter 13  
:  
:

Response to Motion for Relief filed by Consumer Portfolio Services, Inc

Debtors, by and through their attorney, responds as follows:

1-8. Admitted.

9-13 Denied. Strict proof thereof is demanded at trial. Debtors have indicated to counsel that they have since become current. Movant is adequately protected since and the automobile is necessary to an effective reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly  
402 Middletown Blvd.  
Suite 202  
Langhorne, Pa. 19047  
215-741-1100  
mpk@cowanandkelly.com